



Allison  
Hiltner/R10/USEPA/US  
10/14/2005 10:40 AM

To aosullivan@suquamish.nsn.us,  
bjcummings@pugetsound.org, bhel461@ecy.wa.gov,  
carnarec@dfw.wa.gov, Cindy  
Schuster/R10/USEPA/US@EPA, ctho461@ecy.wa.gov,  
dtaylor@suquamish.nsn.us, Gary.Palcisko@DOH.WA.GOV,  
Glen.StAmant@muckleshoot.nsn.us,  
(b) (6), htrim@pugetsound.org,  
James.Meador@noaa.gov, jeff\_krausmann@fws.gov,  
jay\_davis@fws.gov, john.kern@noaa.gov,  
john.s.wakeman@usace.army.mil,  
Kymberly.C.Takasaki@usace.army.mil,  
marla.steinhoff@noaa.gov, ngozi.oleru@metrokc.gov,  
Nick.ladanza@noaa.gov, perry.gayaldo@noaa.gov,  
RHUE461@ecy.wa.gov, robert.duff@doh.wa.gov,  
Sharon.Holly@wadnr.gov, ted.r.turk@cpmx.saic.com,  
tgri461@ecy.wa.gov, Tom.Gibbons@wadnr.gov,  
Wendy.Brown@wadnr.gov, aosullivan@suquamish.nsn.us,  
dtaylor@suquamish.nsn.us  
cc Erika Hoffman/R10/USEPA/US@EPA, Bruce  
Duncan/R10/USEPA/US@EPA, Burt  
Shephard/R10/USEPA/US@EPA, Lon  
Kissinger/R10/USEPA/US@EPA

bcc

Subject Comments on Food Web Model TM

#### Duwamish Reviewers:

Thanks to NOAA, DRCC, and the Suquamish Tribe for their thoughtful comments on the first of 3 technical memoranda on the food web model (FWM) for the Lower Duwamish Waterway Superfund site. I have attached for your information the comments EPA and Ecology sent to LDWG on the FWM, along with the comments provided by stakeholders and associated transmittal letters. (The Suquamish Tribe provided their comments via e-mail, so I have pasted them at the end of this message, and Denise and Alison, I did pass your comments on to our reviewers and the PRPs, even though it's not reflected in the letter below.) You will note from our comments that we shared many of your concerns about the FWM.

As a reminder, we will meet October 24, 12:30 - 2:30, in EPA conference room 15 Denali to discuss the FWM and your comments. BJ, I think it would be very helpful if your technical advisor could be part of this meeting. We can bring him by phone if needed. Please let me know if that would be possible.

Feel free to call if you have any questions.



NOAAcmnts\_FWMTechMemo1\_093005.doc FWM TM 1 cmt ltr transmittal.doc FWM TM 1 comments.doc



FWM TM1 DRCC cmts.doc FWM TM 1 cmt letter.doc

#### Suquamish Tribe comments (received 10/13/05):

In general, the FWM Memorandum 1: Objectives, Conceptual Model and Selection of FWM does not offer a sufficient basis for selecting a model, primarily because the evaluation does not define what degree of accuracy is necessary to make RI/FS decisions using FWM results.

While the Arnot and Gobas (2004) model may be a good choice, it is unclear from the information presented how well the model will be able to meet the specifications listed in Section 4.1. For example, what is considered to be sufficient location-specific data and is it (or will it be) available; what are

USEPA SF



1232302

considered to be reasonable or acceptable levels of uncertainty and variability in predicting sediment or tissue concentrations (given the inherent variability in sediment data); will parameter uncertainty also be quantified or evaluated through comparison with empirical data; and how will differences in time response between sediment and biota be incorporated (which may be especially important in the FS for estimating recovery time after remediation)?

Additional questions include, is the model accurate across the range of contaminants, as well as across the range of concentrations, and how will multiple contaminants be evaluated?

Also, please provide additional detail regarding the preliminary human health risk calculations made using the 2004 fish and crab chemistry data that show that chemical concentrations in seafood will need to be substantially reduced to reach any risk-based goal based on tribal seafood consumption rates (see Section 4.3.1, page 16).

Allison Hiltner  
EPA Region 10  
phone: (206) 553-2140  
fax: (206) 553-0124  
hiltner.allison@epa.gov